

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHICKEN SOUP FOR THE SOUL
ENTERTAINMENT INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11442 (TMH)

(Joint Administration Requested)

Docket Ref. No. 30

**RESPONSE OF WILLIAM ROUHANA TO MOTION TO SHORTEN NOTICE ON HPS
PARTNERS LLC’S MOTION TO (I) RECONSTITUTE THE DEBTORS’ BOARDS OF
DIRECTORS AND STRATEGIC REVIEW COMMITTEES, OR, IN THE
ALTERNATIVE, (II) APPOINT A CHAPTER 11 TRUSTEE, OR,
IN THE ALTERNATIVE, (III) CONVERT THE CHAPTER 11 CASES
TO CHAPTER 7 LIQUIDATION**

Mr. William Rouhana, through his undersigned counsel, hereby files this response (the “Response”) to *Motion to Shorten Notice* [Docket No. 30] (the “Motion to Shorten”) of HPS Investment Partners, LLC’s (“HPS”) *Motion to (i) Reconstitute the Debtors’ Boards of Directors and Strategic Review Committee, or, in the Alternative, (ii) Appoint a Chapter 11 Trustee, or, in the Alternative, (iii) Convert the Chapter 11 Cases to Chapter 7 Liquidation* [Docket No. 29] (the “Motion to Convert”).

RESPONSE

This morning, HPS’s counsel tainted the first day motions proceedings with irresponsibly false and scandalous allegations concerning Mr. Rouhana’s former leadership of the Debtors,

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number (where applicable), are: 757 Film Acquisition LLC (4300); Chicken Soup for the Soul Entertainment Inc. (0811); Chicken Soup for the Soul Studios, LLC (9993); Chicken Soup for the Soul Television Group, LLC; Crackle Plus, LLC (9379); CSS AVOD Inc. (4038); CSSESIG, LLC (7150); Digital Media Enterprises LLC; Halcyon Studios, LLC (3312); Halcyon Television, LLC (9873); Landmark Studio Group LLC (3671); Locomotive Global, Inc. (2094); Pivotshare, Inc. (2165); RB Second Merger Sub LLC (0754); Redbox Automated Retail, LLC (0436); Redbox Entertainment, LLC (7085); Redbox Holdings, LLC (7338); Redbox Incentives LLC (1123); Redwood Intermediate, LLC (2733); Screen Media Films, LLC; Screen Media Ventures, LLC (2466); and TOFG LLC (0508). The Debtors’ corporate headquarters and service address is 132 East Putnam Avenue, Floor 2W, Cos Cob, CT 06807.

based only on unsubstantiated attorney rhetoric, aimed at gaining approval from the Court for a rushed foreclosure by HPS. Mr. Rouhana looks forward to an orderly hearing on the Motion to Convert upon which evidence will be presented refuting these unsupported claims, but that should not be the priority today. Mr. Rouhana believes the Court and the parties' current focus must be on the employees who have already rendered services to the Debtors being immediately paid their wages and their health insurance is reinstated. A briefing schedule on the Motion to Convert should follow rulings that will allow the employees to be immediately paid.

Dated: July 2, 2024
Wilmington, Delaware

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